

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDGE CAPTURE L.L.C. and EDGE SPECIALISTS, L.L.C.,))
Plaintiffs,)	Civil Action No. 09 CV 1521
v.)	JURY TRIAL DEMANDED
BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., UBS AG, UBS FINANCIAL SERVICES INC., UBS SECURITIES L.L.C., WOLVERINE TRADING, L.L.C., AND WOLVERINE EXECUTION SERVICES, L.L.C.,)	Judge Charles R. Norgle, Sr. Magistrate Judge Denlow
Defendants.))

NOTICE OF JOINT MOTION

TO:

Jeffrey G. Randall
**PAUL, HASTINGS, JANOFSKY &
WALKER LLP**
1117 South California Avenue
Palo Alto, California 94304-1106
Phone: (650) 320-1800

Allan M. Soobert
**PAUL, HASTINGS, JANOFSKY &
WALKER LLP**
875 15th Street, N.W.
Washington, D.C. 20005
Phone: (202) 551-1700

Emily Newhouse Dillingham
**PAUL, HASTINGS, JANOFSKY &
WALKER LLP**
191 North Wacker Drive
Chicago, Illinois 60606
Phone: (312) 499-6292

Robert W. Unikel
Deanna L. Keysor
Michelle K. Marek
KAYE SCHOLER LLP
3 First National Plaza
70 West Madison Street
Suite 4100
Chicago, IL 60602-4231
Phone: (312) 583-2300

PLEASE TAKE NOTICE that on July 20, 2011 at 9:15 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Morton Denlow, or any judge sitting in his stead in Courtroom 1350, United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, and shall then and there present THE PARTIES' JOINT MOTION TO MODIFY THE CASE SCHEDULE, IN PART, TO STAY THE DEADLINES IN THE AGREED SCHEDULING ORDER (D.E. 178) FOR EVENTS COVERED BY LPR 2.2 – 2.5 UNTIL THE COURT RULES ON PLAINTIFFS' MOTIONS TO COMPEL 2.1(b)(1) INITIAL DISCLOSURES FROM THE BARCLAYS, UBS, AND WOLVERINE DEFENDANTS (D.E. 191 AND D.E 197), a copy of which is served herewith. The parties to the joint motion do not believe a hearing on the matter is necessary, but will make themselves available to the Court if the Court wishes it.

Dated: July 14, 2011

Respectfully submitted,

By: s/Patrick G. Burns
Ronald J. Schutz (*pro hac vice*)
Munir R. Meghjee (*pro hac vice*)
Sang Young A. Brodie (*pro hac vice*)
Glenna L. Gilbert (ARDC No. 6286244)
Seth A. Nielsen (*pro hac vice*)
ROBINS, KAPLAN, MILLER & CIRESI, L.L.P.
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402
Telephone: (612) 349-8500

Patrick G. Burns (ARDC No. 3122589)
Jeana R. Lervick (ARDC No. 6277887)
Gavin James O'Keefe (ARDC No. 6293489)
GREER, BURNS & CRAIN, LTD.
300 South Wacker Drive, Suite 2500
Chicago, Illinois 60606
Telephone: (312) 360-0080

**ATTORNEYS FOR PLAINTIFFS
EDGE CAPTURE L.L.C. AND EDGE
SPECIALISTS, L.L.C.**

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on July 14, 2011, he caused a true and correct copy of THE PARTIES' JOINT MOTION TO MODIFY THE CASE SCHEDULE, IN PART, TO STAY THE DEADLINES IN THE AGREED SCHEDULING ORDER (D.E. 178) FOR EVENTS COVERED BY LPR 2.2 – 2.5 UNTIL THE COURT RULES ON PLAINTIFFS' MOTIONS TO COMPEL 2.1(b)(1) INITIAL DISCLOSURES FROM THE BARCLAYS, UBS, AND WOLVERINE DEFENDANTS (D.E. 191 AND D.E. 197) to be served on the below parties through the CM/ECF system:

Jeffrey G. Randall jeffrandall@paulhastings.com

Allan M. Soobert allansoobert@paulhastings.com

Emily Newhouse Dillingham emilydillingham@paulhastings.com

Robert W. Unikel robert.unikel@kayescholer.com

Deanna L. Keysor deanna.keysor@kayescholer.com

Michelle Kristina Marek michelle.marek@kayescholer.com

s/Patrick G. Burns
Patrick G. Burns